

# EXHIBIT C

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JAMAL HAMMOUD,	)	
	)	
Plaintiff,	)	
	)	
-against-	)	
	)	
SOCIÉTÉ GÉNÉRALE DE BANQUE AU LIBAN,	)	
	)	
Defendant.	)	
	)	

**1:20-cv-00106-MKV**

**DECLARATION OF JEANINE KABENGI  
IN SUPPORT OF DEFENDANT SGBL'S MOTION TO DISMISS THE AMENDED  
COMPLAINT**

I, Jeanine Kabengi, declare the following pursuant to 28 U.S.C. § 1746.

**Introduction**

1. My name is Jeanine Kabengi. I live in Beit Mery, Lebanon.
2. I have been employed at Société Générale de Banque au Liban, S.A.L. ("SGBL") since 1989. My current title at SGBL is Manager and Head of Shareholders and Institutions Relations Department, which position I have held since 2009.
3. I submit this declaration in support of SGBL's motion to dismiss the amended complaint in the above-captioned matter.
4. I am a native Arabic speaker and am fluent in English. For the ease of the parties, I have prepared this declaration in English. However, each of the facts set forth in this declaration are true and correct to the best of my knowledge.

5. For the purpose of this declaration I have reviewed copies of the original and translated versions of the following documents:
  - a. The “Account Opening Application for Juristic Person” dated November 1, 2011 duly executed by Milestones Capital ME (Offshore) SAL (“Milestones SAL”) and SGBL (the “Agreement”).
  - b. The checks drawn by SGBL on its account with Banque du Liban to the order of Milestones SAL, dated April 2, 2020, for the amounts of \$131,744 and €323,679, respectively (collectively the “Checks”).
  - c. Plaintiff’s original Complaint, the parties’ respective filings in the first motion to dismiss, and the Amended Complaint filed by Plaintiff in this lawsuit.
6. I have personal knowledge of the matters stated here, and if asked to testify to them, I would do so competently. I am familiar with the facts set forth herein based on my work history and experience at SGBL as well as my review of relevant SGBL records and publicly available information, and on that basis believe them to be true and correct.

#### **Background**


7. SGBL was established in Lebanon in 1953 as a private joint stock company.
8. SGBL is organized under and subject to the laws of Lebanon, and is regulated by the Banque du Liban (“BDL”), the central bank and regulatory authority for all Lebanese banks, in addition to the Special Investigation Committee, which is part of Lebanon’s Financial Intelligence Unit.
9. SGBL is a member of the Association of Banks in Lebanon (“ABL”).

10. SGBL is the third largest commercial bank in Lebanon (as at 30.06.2019). It offers banking, insurance, and financial services to individuals and corporations in Lebanon and neighboring countries.
11. SGBL is not incorporated, licensed, registered as a foreign corporation, or otherwise authorized to conduct business anywhere in the United States.
12. SGBL does not have a branch, office, or other regular place of business anywhere in the United States.
13. SGBL does not have any subsidiaries or other corporate presence in the United States.
14. SGBL does not own, lease, or occupy real property in the United States.
15. SGBL has no employees, directors, or officers in the United States.
16. I understand that this Declaration is not intended to waive any of SGBL's privileges, immunities, objections, or defenses in this action, including but not limited to jurisdictional objections and defenses, all of which are reserved.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 18, 2021

Beirut, Lebanon

  
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Jeanine Kabengi